

JAN 10 2008

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISIONMICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**JUDGE KENDALL**

UNITED STATES OF AMERICA)

No. 07 CR 846

v.)

Violations: Title 18, United States

MONIQUE ELLINGTON and)
WILLIE PERKINS)

Code, Sections 656, 2113(b) and 2(b)

COUNT ONE**MAGISTRATE JUDGE SCHENKIER**

The SPECIAL JUNE 2007 GRAND JURY charges:

1. From approximately in or about July 2007 continuing to in or about December 2007,
at Chicago, in the Northern District of Illinois, Eastern Division,

MONIQUE ELLINGTON,

defendant herein, being an employee of Diamond Bank, the deposits of which were then insured by
the Federal Deposit Insurance Corporation, did embezzle and willfully misapply money exceeding
\$1,000 in value, belonging to and entrusted to the custody and care of said bank;

In violation of Title 18, United States Code, Section 656.

COUNT TWO

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about December 14, 2007, at Chicago, in the Northern District of Illinois, Eastern Division,

MONIQUE ELLINGTON and
WILLIE PERKINS,

defendants herein, along with Individual A, did take and carry away, and willfully cause the taking and carrying away, with the intent to steal and purloin, approximately \$5,000 belonging to and in the care, custody, control, management and possession of Diamond Bank, 100 West North Avenue, Chicago, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Sections 2113(b) and 2(b).

FORFEITURE ALLEGATION ONE

The SPECIAL JUNE 2007 GRAND JURY further charges:

1. The allegations contained in Count One of this Indictment are realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(2).

2. As a result of the violation of Title 18, United States Code, Section 656, as alleged in this Indictment,

MONIQUE ELLINGTON,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section, 982(a)(2), any and all right, title and interest in property, real and personal, which constitutes and is derived from proceeds traceable to the charged offense.

3. The interest of the defendant subject to forfeiture pursuant to Title 18, United States Code, Section, 982(a)(2) includes but is not limited to approximately \$12,000 in United States Currency.

4. If any of the property subject to forfeiture and described above, as a result of any act or omission of the defendant:

- (a) Cannot be located upon the exercise of due diligence;
- (b) Has been transferred or sold to, or deposited with, a third party;
- (c) Has been placed beyond the jurisdiction of the Court;
- (d) Has been substantially diminished in value; or

- (e) Has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

All pursuant to Title 18, United States Code, Section 982.

FORFEITURE ALLEGATION TWO

The SPECIAL JUNE 2007 GRAND JURY further charges:

1. The allegations contained in Count Two of this Indictment are realleged and incorporated here by reference as if fully restated herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C), as incorporated by Title 28, United States Code, Section 2461(c).

2. As a result of the violations of Title 18, United States Code, Section 2113, as alleged in this Indictment,

MONIQUE ELLINGTON and
WILLIE PERKINS,

defendants herein, have subjected to forfeiture to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), as incorporated by Title 28, United States Code, Section 2461(c), the following property and interests:

a. All property constituting, and derived from, and traceable to, proceeds obtained, directly or indirectly, as a result of the defendants' violation of Title 18, United States Code, Section 2113.

b. All property that is used to facilitate, and is intended to be used to facilitate the commission of the defendants' violation of Title 18, United States Code, Section 2113.

3. The interests of the defendants subject to forfeiture to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), as incorporated by Title 28, United States Code, Section 2461(c), include, but are not limited to approximately \$5,000 in United States Currency.

4. If any of the property or funds described above as a result of any act or omission of the defendants:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property which cannot be subdivided without difficulty;

It is the intent of the United States, pursuant to provisions of Title 21, United States Code 853(p) to seek forfeiture of substitute property belonging to the defendants;

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY